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March 26, 2021

Honorable J. Paul Oetken  
United States District Court Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10013

Re: USA v. Joao Corcino  
19-Cr. 901(JPO)

Dear Judge Oetken,

I am the attorney for the defendant in the above captioned case. Presently, the case is scheduled for a hearing on May 21, 2021. I write to inform the court of facts affecting Mr. Corcino's pre-trial release. I also write to ask the court to amend the bail conditions, so that Mr. Corcino can remain at liberty, pending the outcome of this case.

At his initial presentment a bail hearing was held, and the court entered an order setting the following conditions of Mr. Corcino's release.

1. \$50,000 PRB signed by two financially responsible people.
2. Travel restricted to SDNY/EDNY.
3. Surrender travel documents.
4. Defendant to submit to urinalysis
5. Defendant to seek employment

6. Defendant to be detained until all conditions are met.

Mr. Corcino was unable to produce individuals who would sign a PRB on his behalf. He remained incarcerated from October 17, 2019 until March 30, 2020. Due to the onset of the pandemic and the particular health risks facing Mr. Corcino, on consent of the Government, the court amended the bail conditions on March 27, 2020. On that date, the court ordered Mr. Corcino's immediate release under the following conditions:

1. Defendant to be released on his own signature and the signature of third-party custodian, James Alves residing at 383 Park Avenue, Weehawken, New Jersey. The previously imposed conditions of pre-trial are to be satisfied within 30 days.

Although Mr. Corcino has obtained employment and has otherwise been completely compliant with pre-trial, he is in danger of being in violation of the conditions on two counts.

Mr. Alves, the third-party custodian, was arrested and charged by officials in New Jersey earlier this month. As a result, Mr. Corcino can no longer reside at the Weehawken residence, and Mr. Alves cannot serve as a third-party custodian. Mr. Corcino has secured a residence at 899 St. Nicholas avenue – room 514, New York, New York. Pre-trial has been notified of this residence and they approve of Mr. Corcino residing in this location.

Secondly, the defense has not and do not believe we will be able to present co-signors for the bond. I am working with Mr. to address this issue and believe we will be able to obtain co-signors on or before April 26, 2021.

The underlying rationale (medical necessity) for Mr. Corcino's release is as imperative today as it was last year. Mr. Corcino has been a model releasee and although the conditions of the bond have not been fulfilled, I request that the court modify the bond. I have conferred extensively with Pretrial Officer Dayshawn Bostic who consents to this request.

I request, with the consent of Pretrial, that Mr. Corcino's conditions be modified. I request that the necessity of a third-party custodian be removed. I also ask, at Pretrial's suggestion, that the defendant be permitted to reside at an address approved by Pretrial and that he not be permitted to relocate without prior approval. I further request that the court extend the time for Mr. Corcino to supply co-signors until April 26, 2021.

I have spoken with AUSA Daniel Nessim and he consents to this modification.

Respectfully submitted,

  
Patrick Joyce

Granted.  
So ordered.  
3/29/2021

  
J. PAUL OETKEN  
United States District Judge